

Date	Hours	Description	Person	Objection Code
9/27/2016	0.4	Set up new matter in clio (the practice management software)	Esmerelda Pereyra	C
9/27/2016	0.4	Completed intake w/ Jeffrey Sawyer and forwarded notes to JTB and NC for review	Benjamin Lin	
9/27/2016	0.1	Spoke to client	Benjamin Lin	
9/29/2016	0.1	Updated active case list with client info	Benjamin Lin	
9/29/2016	0.8	Conducted research on whether client was exempt under motor carrier exemption due to hazardous materials. According to reg. small vehicle exception could apply because transported hazardous materials were <1000 pounds and did not require placarding	Benjamin Lin	
9/29/2016	0.5	Discussed with Nicholas Conlon the viability of client's non-exempt claim and possibility of collective action. Researched cases to find precedent. Discussed follow up questions with client	Benjamin Lin	I
9/29/2016	0.5	Discussed with Benjamin Lin the viability of client's non-exempt claim and possibility of collective action. Researched cases to find precedent. Discussed follow up questions with client	Nicholas Conlon	I
9/29/2016	0.1	Updated Jason Brown on discussion with Nicholas Conlon regarding client's possible non-exempt status and collective action	Benjamin Lin	I
9/29/2016	0.1	Spoke with Benjamin Lin regarding discussion with Nicholas Conlon	Jason Brown	I
9/29/2016	0.5	Discussed with Benjamin Lin the viability of client's non-exempt claim and possibility of collective action. Researched cases to find precedent. Discussed follow up questions with client	Nicholas Conlon	I
9/29/2016	0.5	Discussed with Nicholas Conlon the viability of client's non-exempt claim and possibility of collective action. Researched cases to find precedent. Discussed follow up questions with client	Benjamin Lin	I
9/29/2016	0.1	Uploaded client pay stubs to Clio	Benjamin Lin	
9/29/2016	0.1	Spoke with client	Benjamin Lin	
9/30/2016	0.2	Reviewed client pay stubs	Benjamin Lin	
9/30/2016	0.1	Read and replied to client's email	Benjamin Lin	
9/30/2016	0.4	Conducted research on client's exempt status by reading through DOT regulations. Compiled notes	Benjamin Lin	
9/30/2016	0.1	Read and replied to client's email	Benjamin Lin	

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Exhibit A

Date	Hours	Description	Person	Objection Code
9/30/2016	0.1	Read client's email	Benjamin Lin	
9/30/2016	0.2	Discussed with Tony Teng the probable size/weight of the vans client drove in regarding with small vehicle exception. Discussed calling client's co-workers	Benjamin Lin	I
9/30/2016	0.2	Discussed with Benjamin Lin the probable size/weight of the vans client drove in re: with small vehicle exception. Discussed calling client's co-workers	Tony Teng	I
9/30/2016	0.2	Spoke with client	Benjamin Lin	
9/30/2016	0.2	Compiled notes from client calls and emails	Benjamin Lin	
9/30/2016	0.4	Spoke with Angel Colon who is our client's co-worker	Benjamin Lin	
9/30/2016	0.2	Updated Tony Teng and Jason Brown on call with Angel Colon	Benjamin Lin	I
9/30/2016	0.2	Spoke with Benjamin Lin regarding the phone call with Angel Colon	Jason Brown	I
9/30/2016	0.2	Spoke with Benjamin Lin regarding the phone call with Angel Colon	Tony Teng	I
9/30/2016	0.1	Updated case folder with notes from call to Colon	Benjamin Lin	
10/3/2016	0.2	Damage estimate based on client descriptions	Benjamin Lin	
10/3/2016	0.2	Researched defendant business name, location, past lawsuits	Benjamin Lin	
10/3/2016	0.2	Discussed with Nicholas Conlon framework for collective action analysis and draft complaint	Benjamin Lin	I
10/3/2016	0.2	Discussed with Benjamin Lin framework for collective action analysis and draft complaint	Nicholas Conlon	I
10/3/2016	0.8	Collective action analysis. Reviewed client pay stubs and intake forms	Benjamin Lin	
10/3/2016	1.9	Drafted introduction, venue, parties, and general allegations portions of the complaint. Researched interstate commerce req. of motor carrier exemption, Pennsylvania wage statutes, appropriate venue for suit	Benjamin Lin	
10/4/2016	0.6	Drafted general allegations of complaint, collective action and Penn class action allegations,	Benjamin Lin	
10/4/2016	0.2	Looked for class action complaint against Lincare in CA with Tony Teng	Benjamin Lin	
10/4/2016	0.2	Looked for class action complaint against Lincare in CA with Ben Lin	Tony Teng	D, I
10/4/2016	0.3	Read first amended class-action complaint for Gulley v. Lincare	Benjamin Lin	
10/4/2016	0.1	Reviewed pay stubs to find and document bonus pay. Sent email to client	Benjamin Lin	
10/4/2016	0.6	Drafted class action allegations regarding FLSA, Penn law, and breach of contract	Benjamin Lin	
10/5/2016	0.2	Reviewed Culley case to find similarities in ours	Benjamin Lin	

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10/5/2016	1	Researched federal and Pennsylvania law on non-discretionary bonuses and accurate wage statements	Benjamin Lin	
10/5/2016	2.4	Redrafted complaint to add in new allegations of failure to keep accurate time records and failure to have accurate overtime rates that included non-discretionary bonuses, revised venue and jurisdiction with more information, performed damage analysis on exemplar pay period, edited general allegations for flow and grammar.	Benjamin Lin	
10/5/2016	0.1	Compiled questions for client regarding equipment delivered, bonus policy, time-keeping program, regular hours of work, identity of managers, locations worked	Benjamin Lin	
10/5/2016	0.2	Researched defendants' Pennsylvania registration	Benjamin Lin	
10/5/2016	0.3	Spoke with Nicholas Conlon regarding passage of complaint on bonuses, and on how to deal with small vehicle exemption issues in the complaint	Benjamin Lin	I
10/5/2016	0.3	Spoke with Benjamin Lin regarding passage of complaint on bonuses, and on how to deal with small vehicle exemption issues in the complaint	Nicholas Conlon	I
10/5/2016	0.3	Met with Benjamin Lin to discuss claim of failure to factor non-discretionary bonus into regular rate	Nicholas Conlon	I
10/5/2016	0.3	Met with Nicholas Conlon to discuss claim of failure to factor non-discretionary bonus into regular rate	Benjamin Lin	I
10/5/2016	0.3	Research hazardous material placarding issue	Benjamin Lin	
10/5/2016	0.1	Read Colon v. Loonis sample complaint	Benjamin Lin	
10/5/2016	0.9	Edited complaint to include small vehicle exemption analysis; researched latest version of TCA	Benjamin Lin	
10/5/2016	0.1	Read and responded to client email	Benjamin Lin	
10/5/2016	0.3	Spoke with client	Benjamin Lin	
10/5/2016	0.1	Spoke with Nicholas Conlon about protocols for contacting client's former supervisor	Benjamin Lin	I
10/5/2016	0.1	Spoke with Benjamin Lin about protocols for contacting client's former supervisor	Nicholas Conlon	I
10/6/2016	2.5	Editing complaint, finding more relevant statutes and adding citations, revising for better flow and structure, check for grammar	Benjamin Lin	

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Date	Hours	Description	Person	Objection Code
10/10/2016	1	Reviewed and commented on complaint sent by Benjamin Lin	Nicholas Conlon	
10/10/2016	0.5	Revised complaint per Nicholas Conlon's comments, amended jurisdiction and venue, specified class certification requests	Benjamin Lin	
10/11/2016	0.1	Read and responded to client's email	Benjamin Lin	
10/11/2016	1	Reviewed and commented on complaint sent by Benjamin Lin	Nicholas Conlon	
10/11/2016	2	Revised complaint per Nicholas Conlon's comments, added WPCL count, incorporated legal theory into preliminary statement, recalculated overtime rates	Benjamin Lin	
10/11/2016	0.1	Followed up on status of Colon and spoke with Tamila	Benjamin Lin	
10/11/2016	0.1	Transcribed handwritten notes from client calls into clio	Benjamin Lin	
10/11/2016	0.2	Spoke with Nicholas Conlon regarding complaint edits, protocols for contacting client's former co-workers, Colon, and filing timeline	Benjamin Lin	I
10/11/2016	0.2	Spoke with Benjamin Lin regarding complaint edits, protocols for contacting client's former co-workers, Colon, and filing timeline	Nicholas Conlon	I
10/11/2016	0.1	Spoke with Jason Brown regarding protocol of responding to inquiries from client's co-workers. Sent email to client.	Benjamin Lin	I
10/11/2016	0.1	Spoke with Benjamin Lin regarding protocol responding to inquiries from client's co-workers.	Jason Brown	I
10/12/2016	0.3	Finished citation of Pennsylvania law in preliminary statement, reviewed complaint for spelling/grammar errors	Benjamin Lin	
10/17/2016	0.3	Reviewed and revised Benjamin Lin's draft of complaint and revisions to last round of review	Nicholas Conlon	
10/17/2016	0.7	Proofread complaint	Benjamin Lin	
10/17/2016	0.1	Spoke with Nicholas Conlon regarding filing schedule and contacting witnesses	Benjamin Lin	I
10/17/2016	0.1	Spoke with Benjamin Lin regarding filing scheduled and contacting witnesses	Nicholas Conlon	I
10/17/2016	0.1	Spoke with Jason Brown and Nicholas Conlon regarding filing strategy and timing, whether to contact witnesses	Benjamin Lin	I
10/17/2016	0.1	Spoke with Benjamin Lin and Nicholas Conlon regarding filing strategy and timing, whether to contact witnesses	Jason Brown	I

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10/17/2016	0.1	Spoke with Benjamin Lin and Jason Brown regarding filing strategy and timing, whether to contact witnesses	Nicholas Conlon	I
10/17/2016	0.4	Spoke with witness Justin Schenck	Benjamin Lin	
10/17/2016	0.3	Transcribed notes from Schenck call into Clio and Awo. Updated contact profile	Benjamin Lin	
10/17/2016	1.4	Spoke with Nicholas Conlon and Benjamin Lin regarding the complaint	Jason Brown	D, I
10/17/2016	1.4	Spoke with Jason Brown and Benjamin Lin regarding the complaint	Nicholas Conlon	D, I
10/17/2016	1.4	Spoke with Nicholas Conlon and Jason Brown regarding the complaint and amplified it and made substantial edits consistent with the violations	Benjamin Lin	D, I
10/17/2016	0.1	Read and responded to client's email	Benjamin Lin	
10/17/2016	0.3	Revised complaint per Jason Brown's comments	Benjamin Lin	
10/18/2016	0.1	Checked local rules Eastern District of Pennsylvania	Benjamin Lin	
10/18/2016	0.2	Spoke with Jason Brown and Nicholas Conlon regarding potentially broadening the class to include all hourly employees	Benjamin Lin	I
10/18/2016	0.2	Spoke with Benjamin Lin and Nicholas Conlon regarding potentially broadening the class to include all hourly employees	Jason Brown	I
10/18/2016	0.2	Spoke with Benjamin Lin and Jason Brown regarding potentially broadening the class to include all hourly employees	Nicholas Conlon	I
10/19/2016	0.1	Read client's email	Benjamin Lin	
10/19/2016	0.1	Sent email to potential co-plaintiff	Benjamin Lin	
10/24/2016	0.1	Spoke with Nicholas Conlon about filing without co-plaintiff and broadening class to hourly employees	Benjamin Lin	I
10/24/2016	0.1	Spoke with Benjamin Lin about filing without co-plaintiff and broadening class to hourly employees	Nicholas Conlon	I
10/24/2016	0.7	Revised complaint to broaden class and remove Colon as co-plaintiff	Benjamin Lin	
10/25/2016	0.6	Revised language of complaint regarding class members per Nicholas Conlon's comments	Benjamin Lin	
10/25/2016	0.3	Reviewed draft of complaint; looked for treatment of different positions; focused on specific workweek allegation; wrote email to Benjamin Lin	Nicholas Conlon	
10/25/2016	0.1	Reviewed and responded to email from Nicholas Conlon	Benjamin Lin	I

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Date	Hours	Description	Person	Objection Code
10/25/2016	0.5	Revised complaint for formatting; removed specific allegations of missing wages for a particular week	Benjamin Lin	
10/27/2016	0.8	Further revisions to the complaint, research to corroborate proper defense entity and parsing out the specific week example to articulate the violation when the statute is based on a one week analysis, but the paystub has 2 weeks	Jason Brown	
10/27/2016	0.1	Made final formatting changes to complaint before sending to Nicholas Conlon for filing	Benjamin Lin	
10/27/2016	1	Made final revisions to complaint and consent form and docuSigned to Plaintiff for review before filing	Nicholas Conlon	
10/28/2016	3.9	Search both Defendants entity information other websites and the Pennsylvania, Florida and Delaware Secretary of State websites respectively; search Eastern District of Pennsylvania local rules regarding filing initial pleadings; prepare Civil Cover Sheet, Case Management Track Designation Form, Designation Form and Summons to the 2 Defendants respectively; scan pdf copies of all documents provided in paper form in a computer disc in conformity with the Local Rule 5.1.2; finalize the entire initial pleadings package and send out via overnight FedEx	Tony Teng	C
11/2/2016	0.1	Spoke with Nicholas Conlon and AI about ethical rules regarding contacting former managers of defendant	Benjamin Lin	I
11/2/2016	0.1	Spoke with Benjamin Lin and AI about ethical rules regarding contacting former managers of defendant	Nicholas Conlon	I
11/2/2016	0.3	Researched whether it's permissible to contact Sawyer's former supervisor	Benjamin Lin	I
11/2/2016	0.9	Reviewed Justin Schenck intake and developed list of follow-up questions to prepare declaration in support of 216(b) motion	Nicholas Conlon	
11/3/2016	0.1	Reviewed Nicholas Conlon's drafted follow up questions for Schenck	Benjamin Lin	D
11/3/2016	0.2	Finalized list of questions for Schenck and sent to Ben Lin to prepare for interview	Nicholas Conlon	
11/3/2016	0.1	Nicholas Conlon and Benjamin Lin called and left message for Schenck	Nicholas Conlon	D
11/3/2016	0.1	Nicholas Conlon and Benjamin Lin called and left message for Schenck	Benjamin Lin	D

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11/7/2016	0.2	Spoke with Justin Schenck to request a declaration and conduct partial interview.	Benjamin Lin	
11/8/2016	0.2	Spoke with Justin Schenck with more follow up questions. Typed up and organized notes for review.	Benjamin Lin	
11/9/2016	0.8	Drafted declaration of Justin Schenck	Benjamin Lin	
11/10/2016	0.5	Completed draft of Justin Schenck's declaration	Benjamin Lin	
11/10/2016	0.3	Reviewed and revised declaration of Justin Schenck	Nicholas Conlon	
11/10/2016	0.2	Reviewed recent District. PA 216(b) cases to find good template for Ben to use in drafting 216(b) motion	Nicholas Conlon	
11/11/2016	0.3	Drafted motion for conditional certification	Benjamin Lin	
11/14/2016	1.6	Drafted motion for conditional certification	Benjamin Lin	
11/15/2016	1.1	Researched district court rulings on motions for conditional certification to find similar cases; read cases including Chung v. Wyndham and Jones v. SCO.	Benjamin Lin	
11/15/2016	1.2	Drafted motion for conditional certification; summarized relevant case law	Benjamin Lin	
11/16/2016	0.3	Briefly reviewed Ben Lin's draft of 216(b) motion and met with him to discuss revisions.	Nicholas Conlon	
11/16/2016	0.1	Spoke with Nicholas Conlon regarding the revisions to the 216(b) motion	Benjamin Lin	
11/16/2016	0.4	Revised declaration of Justin Schenck to specify the recipients of emails dictating corporate policy	Benjamin Lin	
11/16/2016	0.6	Drafted motion for conditional certification; expanded summary of facts to include background on the parties and violations	Benjamin Lin	
11/16/2016	0.2	Spoke with Nicholas Conlon regarding the investigating location of defendants' headquarters and drafting plaintiff's declaration	Benjamin Lin	I
11/16/2016	0.2	Spoke with Benjamin Lin regarding the investigating location of defendants' headquarters and drafting plaintiff's declaration	Nicholas Conlon	I
11/16/2016	0.5	Drafted plaintiff's declaration	Benjamin Lin	
11/16/2016	0.2	Reviewed and revised declaration of Justin Schenck	Nicholas Conlon	
11/17/2016	0.5	Drafted plaintiff's declaration	Benjamin Lin	
11/17/2016	0.2	Reviewed and revised portions of declaration of Justin Schenck	Jason Brown	
11/17/2016	0.2	Incorporated Jason Brown's revisions to Schenck declaration and sent to Schenck via docusign; drafted cover letter with instructions	Nicholas Conlon	

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Date	Hours	Description	Person	Objection Code
11/18/2016	0.4	Discussed declaration of plaintiff and follow up questions with Nicholas Conlon	Benjamin Lin	
11/18/2016	0.4	Discussed declaration of plaintiff and follow up questions with Benjamin Lin	Nicholas Conlon	
11/18/2016	0.7	Drafted plaintiff's declaration to include details regarding vehicles driven	Benjamin Lin	
11/18/2016	0.2	Met with Benjamin Lin to discuss revisions to Sawyer's declaration	Nicholas Conlon	I
11/18/2016	0.2	Met with Nicholas Conlon to discuss revisions to Sawyer's declaration	Benjamin Lin	I
11/19/2016	0.6	Reviewed plaintiff declaration with Sawyer, and discussed other issues including defendant's potential destruction of evidence, observations of other branches' work schedules, and descriptions of the vans	Benjamin Lin	
11/21/2016	0.1	Updated Nicholas Conlon on weekend call with Sawyer	Benjamin Lin	I
11/21/2016	0.1	Spoke to Benjamin Lin regarding weekend call with Sawyer	Nicholas Conlon	I
11/29/2016	0.4	Revised plaintiff's declaration per Nicholas Conlon's comments	Benjamin Lin	
11/30/2016	0.7	Revising plaintiff's declaration based on Nicholas Conlon's edits	Benjamin Lin	
11/30/2016	0.8	Reviewed, revised, and commented on Ben Lin's draft of Sawyer's declaration	Nicholas Conlon	
11/30/2016	0.1	Met with Ben Lin to discuss how to allege vehicle weight in 216(b) declaration	Nicholas Conlon	I
11/30/2016	0.1	Met with Nicholas Conlon to discuss how to allege vehicle weight in 216(b) declaration	Benjamin Lin	I
11/30/2016	0.5	Spoke with Nicholas Conlon regarding researching precedent on showing of small vehicle exception at certification stage, and on possible model of vans driven by client	Benjamin Lin	I
11/30/2016	0.5	Spoke with Ben Lin regarding researching precedent on showing of small vehicle exception at certification stage, and on possible model of vans driven by client	Nicholas Conlon	I
11/30/2016	0.9	Researched case law on proof necessary for small vehicle exception at certification stage; read cases including Boyd v. Schwebel and Naicker v. Warrior Energy.	Benjamin Lin	
11/30/2016	0.5	Researched the vehicles defendants could have used; sent candidates to client for confirmation	Benjamin Lin	
11/30/2016	0.6	Reviewed cases addressing small vehicle exemption in ruling on 216(b) motion	Nicholas Conlon	

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12/1/2016	0.2	Met with Ben Lin to discuss Sawyer and Schenck's knowledge of Ford Transits at other locations	Nicholas Conlon	I
12/1/2016	0.2	Met with Nick to discuss Sawyer and Schenck's knowledge of Ford Transits at other locations	Benjamin Lin	I
12/1/2016	0.2	Corresponded with client	Benjamin Lin	
12/1/2016	0.1	Spoke with Nicholas Conlon regarding scheduling call with client and standards for certification	Benjamin Lin	I
12/1/2016	0.1	Spoke with Ben Lin regarding scheduling call with client and standards for certification	Nicholas Conlon	I
12/1/2016	0.3	Read Dunkel v. Warrior Energy	Benjamin Lin	
12/1/2016	0.3	Revised plaintiff declaration after he identified the vehicle he drove	Benjamin Lin	
12/1/2016	0.4	Spoke with client	Benjamin Lin	
12/2/2016	0.1	Spoke with Nicholas Conlon regarding the phone call with our client	Benjamin Lin	I
12/2/2016	0.1	Spoke with Ben Lin regarding his phone conversation with our client	Nicholas Conlon	I
12/6/2016	0.3	Spoke with Justin Schenck	Benjamin Lin	
12/6/2016	0.5	Revised declarations of plaintiff and Schenck to include new information regarding the vans used by defendants	Benjamin Lin	
12/7/2016	1.2	Revised plaintiff and Schenck's declarations to include new information about defendant's vehicles and bonus pay policy	Benjamin Lin	
12/7/2016	0.7	Spoke with potential witness	Benjamin Lin	
12/7/2016	0.2	Reviewed OLM leads from Lincare and sent to Ben Lin for outreach	Nicholas Conlon	D
12/7/2016	0.2	Reviewed Lincare OLM leads sent by Nicholas Conlon	Benjamin Lin	D
12/7/2016	0.2	Met with Ben Lin to discuss recap of calls with Sawyer and Schenck	Nicholas Conlon	I
12/7/2016	0.2	Met with Nicholas Conlon to discuss recap of calls with Sawyer and Schenck	Benjamin Lin	I
12/11/2016	0.7	Reviewed and revised Sawyer and Schenck declarations for 216(b) motion	Nicholas Conlon	
12/12/2016	0.8	Revised plaintiff's declaration per Nicholas Conlon's edits	Benjamin Lin	
12/12/2016	0.3	Revised Schenck's declaration per Nicholas Conlon's edits	Benjamin Lin	
12/12/2016	0.5	Reviewed and revised Ben Lin's revisions to Sawyer declaration	Nicholas Conlon	
12/13/2016	1.2	Finalized Sawyer and Schenck declarations and exhibit; sent via docusign for signature	Nicholas Conlon	
12/13/2016	0.3	Reviewed finalized 216b declarations	Benjamin Lin	

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12/14/2016	0.2	Discussed revisions to 216(b) memo with Ben Lin	Nicholas Conlon	
12/14/2016	0.2	Discussed revisions to 216(b) memo with Nicholas Conlon	Benjamin Lin	
12/14/2016	0.2	Searched for job descriptions on company website and wrote email to Ben Lin regarding including in 216(b) motion	Nicholas Conlon	
12/14/2016	0.1	Reviewed emails send by Nicholas Conlon	Benjamin Lin	I
12/14/2016	0.2	Spoke with Nicholas Conlon regarding exemplars to use for drafting motion for conditional certification	Benjamin Lin	I
12/14/2016	0.2	Spoke with BL regarding exemplars to use for drafting motion for conditional certification	Nicholas Conlon	I
12/14/2016	0.6	Reviewed and copied job descriptions for Lincare's hourly job positions	Benjamin Lin	
12/14/2016	3.4	Read memoranda in support of motions for conditional certification; revised Sawyer's 216(b) motion to incorporate job descriptions and defendant background; prepared exhibits	Benjamin Lin	
12/15/2016	1.1	Prepared 7 exhibits for attachment to 216(b) motion, including declarations, descriptions of defendant's business and job positions	Benjamin Lin	
12/15/2016	2.7	Drafted factual summary for 216(b) motion; revised for greater detail of commonalities among class members; investigated job descriptions for employees from different locations; wrote notes of questions and deficiencies for Nicholas Conlon's review; reviewed local citation rules	Benjamin Lin	
12/15/2016	0.3	Reviewed Ben Lin's notes of questions and deficiencies	Nicholas Conlon	
12/16/2016	1.3	Researched 3rd Circuit case law on conditional certification; read cases including Williams v. Owen, De Asencio v. Tyson, Goldman v. RadioShack	Benjamin Lin	
12/16/2016	1.6	Drafted memo of law on 3rd Circuit standards and burden of proof for rule 216(b) motion; reviewed BlueBook and judge's citation rules; discussed citation and evidentiary issues with Nicholas Conlon	Benjamin Lin	
12/16/2016	0.3	Discussed citation and evidentiary issues with Ben Lin	Nicholas Conlon	
12/19/2016	4.4	Performed research for 216(b) motion. Read cases including Naicker v. Warrior Energy, Viscomi v. Clubhouse, Chabrier v. Wilmington, Adami v. Cardo. Completed drafting portion of memo of law on evidence that putative class members are similarly situated, and on merits of claims at the notice stage under 3rd Circuit case law	Benjamin Lin	

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12/20/2016	3.1	Drafted 216(b) motion: researched 3rd Circuit cases regarding SOL concerns for collective actions; completed introduction and introduction; revised legal analysis to include more descriptions of the declarations; formatted document for consistency; organized cases and exhibits; sent to Nicholas Conlon for review	Benjamin Lin	
12/20/2016	0.2	Initial review of Ben Lin's draft of 216(b) motion	Nicholas Conlon	
12/29/2016	3.8	Work on collective certification motion - discussions with Ben Lin, trying to flush out respective violations and corroborate the nature of the paper violation versus the lunch time and buttress argument and law for the substantive violations.	Jason Brown	
12/29/2016	0.1	Spoke with Jason Brown and Nicholas Conlon regarding 216(b) motion	Benjamin Lin	I
12/29/2016	0.1	Spoke with Ben Lin and Nicholas Conlon regarding 216(b) motion	Jason Brown	I
12/29/2016	0.1	Spoke with Jason Brown and Ben Lin regarding 216(b) motion	Nicholas Conlon	I
12/29/2016	0.4	Read Jason Brown's revised version of 216(b) motion	Benjamin Lin	D
12/29/2016	1.3	Continued work on the motion - discussion with Nicholas Conlon & Ben Lin regarding the case - detailed analysis of the certifications to make sure they with withstand cross-examination and are precisely articulated	Jason Brown	
12/29/2016	0.4	Discussions with Jason Brown and Nicholas Conlon regarding the case	Benjamin Lin	I
12/29/2016	0.4	Discussions with Ben Lin and Jason Brown regarding the case	Nicholas Conlon	I
12/30/2016	0.2	Met with Jason Brown to discuss his revisions to 216(b) motion	Nicholas Conlon	I
12/30/2016	0.1	Met with Nicholas Conlon to discuss revisions made to the 216(b) motion	Jason Brown	I
12/30/2016	1.3	Researched 3d Circuit cases for 216(b) motion regarding meal break pay. Read cases including Oakes v. Pennsylvania, Bowe v. Enviro Pro, Camesi v. Univ. of Pittsburgh Med.	Benjamin Lin	
1/3/2017	1.5	Researched cases and codes regarding calculating overtime pay with bonuses; read cases including Minizza v. Stone Container Corp. Revised 216(b) motion per Jason Brown's comments, incorporating new case law and references to exhibits. Reviewed and made edits for grammar, organization, and flow.	Benjamin Lin	
1/3/2017	1	Reviewed most recent additions and revisions to draft of 216(b) brief; made comments for additional work needed	Nicholas Conlon	

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1/4/2017	0.2	Sent Service request to two(2) Defedendant's., 1)Lincare, Inc. and 2) Health Care Solutions at Home Inc., in Florida.	Christy Weser	C
1/4/2017	0.5	Handled service of summons; reviewed file to find previously-issued summons; searched for address to serve; looked into whether any further steps needed for issuing summons. Sent instructions to CW to send out for service	Nicholas Conlon	
1/4/2017	0.1	updated case file with Document: Sawyer v. Lincare - GS - Service to Lincare Inc. - Confirmation 20170104162008 - Received 010417.pdf	Christy Weser	C
1/4/2017	0.3	Discussed 216(b) motion with Nicholas Conlon: which case laws are needed, filing timeline	Benjamin Lin	D, I
1/4/2017	0.3	Discussed 216(b) motion with Ben Lin: which case laws are needed, filing timeline	Nicholas Conlon	D, I
1/6/2017	1.7	Revised 216(b) motion; incorporated more quotations from declarations, and more case law	Benjamin Lin	
1/8/2017	0.9	Reviewed order denying 216(b) certification in Udo and reviewed other recent cases against Lincare	Nicholas Conlon	
1/9/2017	0.6	Read outcome of past certification motion against defendant. Discussed with Jason Brown and Nicholas Conlon	Benjamin Lin	
1/9/2017	0.3	Discussed outcome of past certification motion against defendant with Ben Lin and Jason Brown	Nicholas Conlon	D, I
1/9/2017	0.3	Discussed outcome of past certification motion against defendant with Ben Lin and Nicholas Conlon	Jason Brown	
1/13/2017	0.1	check and review records if Summons and Complaint was served to Defendants (x2)	Christy Weser	C
1/16/2017	2.9	Researched/read cases on obtaining putative class member emails, including Pearsall-Dineen, Vargas, Kuznyetsov; revised 216(b) motion to include research and argument on discovery of class member contact info	Benjamin Lin	
1/17/2017	4.7	Researched case law on electronic notice for FLSA collective and hearsay regarding declarations in support of 216(b) motions; incorporated arguments and case law into motion; revised motion to accord citations with judge's rules and for clarity, grammar, and organization	Benjamin Lin	

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Date	Hours	Description	Person	Objection Code
1/17/2017	0.6	Reviewed and commented on revised draft of 216(b) motion	Nicholas Conlon	
1/18/2017	1.2	Revised 216(b) motion per Nicholas Conlon's comments; distinguished instant matter from Udo v. Lincare.	Benjamin Lin	
1/20/2017	0.1	Check for affidavit from Servers website. (not available)	Christy Weser	C
1/20/2017	1.3	Reviewed filings in Eastern District of Pennsylvania for samples of 216(b) motions; drafted proposed notice order, attorney's declarations, and notice	Benjamin Lin	
1/24/2017	0.1	Attorney Ashwin Trehan called in to speak with Jason Brown. Call has been circulated to handling attorney.	Vanessa Reyes	C
1/24/2017	0.1	Phone call with defense counsel; requested 14 extra days to answer	Nicholas Conlon	
1/24/2017	0.1	Update Defense Counsel contact information	Christy Weser	C
1/24/2017	0.1	Took phone call from court clerk regarding clarification of Defendant's unopposed motion to extend time to answer	Nicholas Conlon	
1/24/2017	0.2	Downloaded service affidavits from Guaranteed Subpoena's website and filed on ECF	Nicholas Conlon	
1/26/2017	0.1	Entered Expenses for Nicholas Conlon Pro Hac Vice Notary fee	Christy Weser	C
1/26/2017	0.1	Updated case file with Postnet receipt	Christy Weser	C
1/27/2017	0.3	Finalized and filed PHV motion	Nicholas Conlon	C
2/28/2017	1.2	Reviewed 216(b) brief and made comments for further editing	Nicholas Conlon	
3/10/2017	2.7	Reviewed and revised 216(b) brief; cleaned up request for relief section and made consistent with conclusion; reviewed website exhibits, revised and reorganized statement of facts section; legal research into bonus-pay issue and revised analysis of that issue in brief	Nicholas Conlon	
3/11/2017	3.8	Reviewed and revised 216(b) brief; added more recent case law to summary of law section; reorganized subsections in legal analysis section; searched for 216(b) opinions of Judge Gardner; reviewed Bell v. Reading Hospital de-cert. order; read over earlier sections of brief and polished language	Nicholas Conlon	
3/11/2017	2.2	Further revision to 216(b) brief - reviewed conditional certification cases involving small number of declarations, meal break policies, and failure to factor bonuses into regular rate	Nicholas Conlon	

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3/12/2017	8.4	Completed draft of 216(b) brief; added sections on low number of declarations for certification., certification of meal break and bonus-pay policies; researched and added discussion of case law regarding various merits-based defenses that defense may raise i.e. written policy and motor carrier exemption; researched and added discussion of support provided by job descriptions from around Pennsylvania; revised all citations to exhibits and cases; ensured citation formats complied with judge's individual rules	Nicholas Conlon	E
3/13/2017	0.5	Reviewed updated draft of 216(b) brief; discussed with NC	Benjamin Lin	D, I
3/13/2017	0.2	Discussed 216(b) brief with BL	Nicholas Conlon	I
3/13/2017	2.6	Prepared exhibits; drafted notice and consent forms, declaration of attorney, proposed text message notice	Benjamin Lin	
3/13/2017	2.9	Revised 216(b) motion after Nicholas Conlon's edits; checked case citations; created table of contents and table of authorities	Benjamin Lin	
3/13/2017	0.3	Minor follow-up revisions to 216(b) motion to replace several weak sentences in brief	Nicholas Conlon	
3/13/2017	0.2	Wrote email to Ben Lin with instructions for drafting supporting 216(b) documents and sent him examples from prior cases to work from	Nicholas Conlon	I
3/13/2017	0.2	Reviewed email sent by Nicholas Conlon regarding 216(b) motion	Benjamin Lin	I
3/13/2017	1.4	Organization of the argument for the 216(b) motion	Jason Brown	E
3/14/2017	3.2	Finalization of the 216(b)	Jason Brown	E
3/14/2017	0.9	Reviewed case files to retrieve requested documents; reviewed edits to 216(b) motion; discussed motion issues with Jason Brown and Nicholas Conlon	Benjamin Lin	D, I
3/14/2017	0.3	Discussed motion issues with Ben Lin and Jason Brown	Nicholas Conlon	I
3/14/2017	0.3	Discussed motion issues with Ben Lin and Nicholas Conlon	Jason Brown	I
3/14/2017	2.8	Reviewed JTB's edits and comments; integrated comments and worked on areas in need of improvement, i.e.description of Udo case, more emphasis on probative value of Schenck declaration, breakdown of bonus pay regular rate violation	Nicholas Conlon	
3/15/2017	0.2	Revising 216(b) notice per Nicholas Conlon's comments	Benjamin Lin	

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3/15/2017	0.6	Reviewed job descriptions posted by defendants and compared different locations for consistency; summarized and drafted analysis	Benjamin Lin	
3/15/2017	1	Final review of 216(b) motion; fixed grammar and punctuation errors; updated table of contents and authorities	Benjamin Lin	
3/15/2017	0.8	Reviewed and incorporated last round of comments from JTB; reworked Udo discussion to mention no manager declaration in that case	Nicholas Conlon	
3/15/2017	1.7	Reviewed and revised 216(b) motion and exhibits; revised language in notice, consent form, declarations, proposed order, and notice of motion; went over websites to make sure all included and properly formatted	Nicholas Conlon	
3/15/2017	0.7	Saved and labelled pdf versions of all documents, filed on ECF, labelled all exhibits; created courtesy copy binder and cover letter	Nicholas Conlon	C
3/21/2017	0.1	Email from defendants asking for 30 day extension to reply to certification motion and draft reply email	Jason Brown	
3/21/2017	0.1	Reviewed and responded to email from Sawyer defense counsel requesting extension to respond to 216(b) motion	Nicholas Conlon	
3/21/2017	0.3	Phone call with defense counsel discussing requested extension to 216(b) motion and possible compromise on scope of collective	Nicholas Conlon	
3/22/2017	0.2	Phone call with defense counsel - he advised they are moving for 30-day extension	Nicholas Conlon	
3/22/2017	0.1	Updated case information for team discussion	Benjamin Lin	C
3/22/2017	0.2	Reviewed Defendant's motion for 30-day extension to respond to 216(b) motion	Nicholas Conlon	
3/23/2017	0.4	Review of their motion for extension of time for 30 days and we proposed 21 days with ET - they wouldn't even give us ET. Outline for defense	Jason Brown	E
3/23/2017	0.1	Wrote email to defense counsel proposing 30-day extension with tolling	Nicholas Conlon	
3/27/2017	1.1	Drafted response to Defendant's motion for extension of time to respond to 216(b) motion	Nicholas Conlon	
3/27/2017	0.1	Took phone call from Judge Gardner's clerk and clarified intent to respond to motion for extension	Nicholas Conlon	
3/27/2017	0.2	Discussed draft of response to defendant's extension motion with Jason Brown and edited according to his comments - i.e. more emphasis on tolling	Nicholas Conlon	

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3/27/2017	0.1	Discussed draft of response to defendant's extension motion with Nicholas Conlon	Jason Brown	I
3/31/2017	0.2	Reviewed and calendared court's order granting Defendant's request for 30 extension	Nicholas Conlon	
4/21/2017	0.7	Reviewed judge and local rules regarding pretrial conference and reports; calendared dates	Benjamin Lin	C
4/21/2017	0.2	Reviewed and calendared order setting initial conference	Nicholas Conlon	
4/28/2017	0.5	Reviewed Defendant's opposition to 216(b) and wrote email to Jason Brown and Ben Lin	Nicholas Conlon	
4/29/2017	1.2	Reviewed 3rd circuit case law regarding enforceability of class waivers; preparation for drafting reply to Defendant's opposition to 216(b) certification	Nicholas Conlon	
4/30/2017	0.2	Reviewed emails from Jason Brown and Nicholas Conlon regarding preparing reply brief	Benjamin Lin	I
4/30/2017	0.2	Reviewed and responded to emails from Nicholas Conlon and Ben Lin regarding preparing reply brief	Jason Brown	I
4/30/2017	0.8	Reviewed Defendant's opposition to 216(b) and declarations submitted in support	Nicholas Conlon	
5/1/2017	0.9	Read defendant's response brief; spoke with NC regarding rebuttal arguments	Benjamin Lin	
5/1/2017	3.6	Researched and read case law on the enforceability of collective action waivers in the 3rd district, including Delaney, Porreca, Giaquinto, Richardson, and Plebani	Benjamin Lin	
5/2/2017	3.1	Researched and read case law regarding federal courts' treatment of collective action waivers at the conditional certification stage, including Feamster, Adams, Palacios, Robertson, Adami, Kubischta; drafted summaries of helpful cases for NC's review	Benjamin Lin	
5/2/2017	1.2	Researched cases in preparation for 216(b) reply brief; whether class waivers are enforceable in absence of arbitration agreement and whether class waiver defenses can be raised at 216(b) stage	Nicholas Conlon	
5/2/2017	0.2	Called/emailed plaintiff and potential witness	Benjamin Lin	

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5/4/2017	0.7	Reviewed Defendant's opposition and worked on outline of points to respond to in reply brief	Nicholas Conlon	
5/5/2017	9.1	Reviewed attachments/declarations from defendant's response to 216(b) for pertinent points to address in reply; quoted and summarized relevant portions; reviewed NC's outline for reply brief; researched case law for reply brief and quoted/summarized for NC	Benjamin Lin	E
5/5/2017	2.4	Final Revisions for reply brief for collective cert	Jason Brown	E
5/5/2017	3.6	Outlined and reviewed cases in preparation for drafting reply brief in support of 216(b) motion	Nicholas Conlon	E
5/5/2017	6.2	Drafted and filed reply brief in support of 216(b) motion	Nicholas Conlon	E
5/10/2017	0.1	Exchanged emails with defense counsel regarding setting up telephonic 26(f) conference	Nicholas Conlon	
5/10/2017	0.4	Held telephonic 26(f) conference with defense counsel Marilyn Moran	Nicholas Conlon	
5/10/2017	0.1	Wrote email to Ben Lin re: instructions for speaking with Plaintiff for purposes of preparing initial disclosures and RFPs	Nicholas Conlon	I
5/10/2017	2.1	Reviewed Supreme Court and circuit Coa cases on enforceability of Arb clauses and class waivers in general and in flsa context; Concepcion, gilmer. Italian colors, Sutherland, epic v. Lewis	Nicholas Conlon	
5/10/2017	0.3	Reviewed sample RFPs and interrogatories; called/emailed plaintiff	Benjamin Lin	
5/10/2017	0.1	Email discussion regarding meet and confer and initial disclosures	Benjamin Lin	I
5/10/2017	0.1	Reviewed calendar; emailed Nicholas Conlon regarding meet and confer deadline	Benjamin Lin	C, I
5/11/2017	0.1	Read email from client regarding his documents and schedudule	Benjamin Lin	
5/15/2017	0.4	Phone call with Marilyn Moran; discussed plan to file joint motion to adjourn scheduling conference until after 216(b) motion is decided	Nicholas Conlon	
5/15/2017	0.4	Conference call with Nicholas Conlon and defense counsel regarding discovery, joint status, and future conference	Benjamin Lin	D
5/15/2017	0.4	Drafted joint letter for continuance of 26(f)	Benjamin Lin	
5/16/2017	0.2	Met with Ben Lin to discuss points to raise in Sawyer joint letter requesting adjournment of initial conference	Nicholas Conlon	I

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5/16/2017	0.5	Discussed joint letter to court regarding 26(f); drafted letter per Nicholas Conlon's comments	Benjamin Lin	I
5/16/2017	0.6	Drafted joint letter for continuance of 26(f)	Benjamin Lin	
5/17/2017	0.8	Reviewed and revised Ben Lin's draft of joint letter to court requesting continuance of initial conference	Nicholas Conlon	
5/17/2017	0.2	Reviewed local and individual rules to confirm JTB needs to attend initial conference on 5/31	Nicholas Conlon	
5/17/2017	0.1	Reviewed Nicholas Conlon's draft of joint letter to continue conference	Benjamin Lin	D
5/18/2017	0.2	Reviewed defense counsel's revisions to joint letter requesting continuance of initial conference and finalized and emailed to chambers	Nicholas Conlon	
5/23/2017	0.2	Exchanged emails with Ben Lin regarding drafting initial disclosures and 26(f) report	Nicholas Conlon	I
5/23/2017	0.2	Exchanged emails with Nicholas Conlon regarding drafting initial disclosures and 26(f) report	Benjamin Lin	I
5/23/2017	0.2	Reviewed and revised draft of initial disclosures	Nicholas Conlon	
5/23/2017	1.7	Reviewed letter from court; spoke with Nicholas Conlon; prepared for initial disclosures	Benjamin Lin	
5/23/2017	2	Drafted initial disclosures; drafted 26(f) report	Benjamin Lin	
5/24/2017	0.2	Rule 26 scheduling report work on	Jason Brown	
5/24/2017	1.6	Reviewed and revised Ben Lin's draft of 26(f) report	Nicholas Conlon	
5/24/2017	0.1	Met with Jason Brown to discuss strategy for initial conference	Nicholas Conlon	D, I
5/24/2017	0.1	Met with Nicholas Conlon to discuss strategy for initial conference i	Jason Brown	
5/24/2017	0.1	Wrote email to defense counsel with draft of 26(f) report and initial disclosures	Nicholas Conlon	
5/24/2017	2.1	Drafted 26(f) report; call with client to confirm documents and for case update	Benjamin Lin	
5/24/2017	0.3	Reviewed Nicholas Conlon's edits to 26(f) report; emailed Nicholas Conlon	Benjamin Lin	D, I
5/25/2017	0.2	Reviewed defense counsel's revisions to 26(f) report and emailed her back confirming acceptance of changes	Nicholas Conlon	
5/30/2017	0.1	Email to defense to see if they want to discuss the matter in person pre-conference	Jason Brown	

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5/30/2017	1.4	Preparation for tomorrow's conference and thorough review of 216(b) motion and opposition in case the Court asks us about it, as well as the joint scheduling report	Jason Brown	
5/30/2017	0.9	Reviewed emails; read final 26(f) report; reviewed filed documents; prepared binder of pleadings for conference	Benjamin Lin	C
5/30/2017	0.8	Prepared binder of pleadings for conference	Benjamin Lin	C
5/30/2017	0.3	Prepared binder of pleadings for conference	Benjamin Lin	C
5/30/2017	1.9	Prepared binder of pleadings for conference; drafted summary of case; discussed with Jason Brown	Benjamin Lin	C
5/31/2017	3.2	Travel from Jersey City to Allentown for Court and back	Jason Brown	T
5/31/2017	0.6	In person Court discussions regarding scheduling and meeting with opposing counsel before and after discussing the case	Jason Brown	
5/31/2017	0.4	Met with Jason Brown and Ben Lin to prepare for initial conference; went over arguments that could come up regarding the pending motion and the proposed scheduling order	Nicholas Conlon	D, I
5/31/2017	0.4	Met with Jason Brown and Nicholas Conlon to prepare for initial conference; went over arguments that could come up regarding the pending motion and the proposed scheduling order	Benjamin Lin	D, I
5/31/2017	0.4	Met with Nicholas Conlon and Ben Lin to prepare for initial conference; went over arguments that could come up regarding the pending motion and the proposed scheduling order	Jason Brown	D, I
5/31/2017	0.3	Phone call with Jason Brown after initial conference; discussed court's order to provide brief explaining recent 6th circuit NLRB decision	Nicholas Conlon	D, I
5/31/2017	0.3	Phone call with Nicholas Conlon after initial conference; discussed court's order to provide brief explaining recent 6th circuit NLRB decision	Jason Brown	D, I
5/31/2017	1.9	Meeting with Jason Brown and Nicholas Conlon; prepared binder for initial conference; reviewed defendant's prior litigation; reviewed case files for details of claims and plaintiff's employment history; researched Pennsylvania law	Benjamin Lin	D, I, C
6/1/2017	0.3	Read majority and dissenting opinions in 6th circuit NLRB class waiver case	Nicholas Conlon	
6/7/2017	0.1	Reviewed email regarding potential witness	Benjamin Lin	

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6/8/2017	4.6	Drafted letter to court regarding Plaintiff's (P's) position on recent case NLRB v. Alt. Entm't, Inc., 2017 U.S. App. LEXIS 9272, 2017 FED App. 0113P (6th Cir.) (6th Cir. May 26, 2017)	Nicholas Conlon	E
6/9/2017	1.5	Supplemental briefing on NLRB v. Alt. Entm't, Inc., 2017 U.S. App. LEXIS 9272, 2017 FED App. 0113P (6th Cir. May 26, 2017) how it effects our case	Jason Brown	E
6/9/2017	0.7	Made additional revisions to letter to court regarding class waivers to improve clarity; reviewed and incorporated JTB's edits; finalized address info and e-mailed to court	Nicholas Conlon	E
6/14/2017	0.1	Reviewed Defendant's letter to court regarding class waiver issue	Nicholas Conlon	
6/14/2017	0.6	Review of Defense submission regarding the circuit case	Jason Brown	
7/5/2017	0.1	Read client's email; discussed with Nicholas Conlon; emailed client	Benjamin Lin	
7/5/2017	0.1	Discussed case with Ben Lin	Nicholas Conlon	I
10/2/2017	0.3	Responded to e-mail from Plaintiff; send him complaint and template consent form; reviewed his documents received to date and sent to him to assess whether he has any additional documents to produce	Nicholas Conlon	
11/21/2017	0.3	Reviewed MSJ and decert opinions from Culley v. Lincare Inc., 236 F. Supp. 3d 1184	Nicholas Conlon	
3/1/2018	0.1	Sent FOIA Request via Email	Bernardo Valdez	C
3/19/2018	0.1	Read email from client; discussed with Nicholas Conlon	Benjamin Lin	
3/19/2018	0.1	Discussed email Ben Lin received from Client	Nicholas Conlon	
4/26/2018	0.4	Review of opinion granting in part collective certification	Jason Brown	
4/26/2018	0.2	Reviewed order granting 216(b)	Benjamin Lin	
4/26/2018	0.3	Reviewed court's order regarding 216(b) motion	Nicholas Conlon	
4/27/2018	0.4	Reviewed 216(b) orders and prior scheduling order and scheduled dates for notice and discovery	Nicholas Conlon	
5/4/2018	0.1	Wrote email to Plaintiff letting him know court granted 216(b) motion	Nicholas Conlon	
5/14/2018	0.4	Prepared revised 216(b) notice in accordance with court's order; revised to reflect collective positions, dates, claims at issue	Nicholas Conlon	
5/14/2018	0.2	Read and responded to emails with Helen Cheng and Sarah Koyanagi regarding using BRM to send 216(b) notices and consent forms	Nicholas Conlon	C, I

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5/16/2018	0.4	Reviewed Defendant's proposed revisions to notice; made further revisions with more employee-friendly language regarding costs; read and responded to emails with defense counsel regarding reasons for changes	Nicholas Conlon	
5/17/2018	1.2	Drafted joint motion to approve notice and proposed order; finalized notice exhibits; sent to defense for confirmation; filed on ECF and sent proposed order to clerk	Nicholas Conlon	
5/22/2018	0.1	Read and responded to email from defense counsel regarding intention to move for reconsideration in light of Epic v Lewis	Nicholas Conlon	
5/29/2018	0.3	Reviewed email from defense counsel with outline of argument anticipated in motion for reconsideration; reviewed 216(b) opposition to assess record to date: regarding Plaintiff's signature on employee handbook; wrote back indicating we oppose	Nicholas Conlon	
5/31/2018	1	Review of their motion for reconsideration	Jason Brown	
5/31/2018	0.7	Reviewed Defendant's motion for reconsideration of order granting 216(b) motion; reviewed cases cited therein and prepared outline of response	Nicholas Conlon	
5/31/2018	0.5	Reviewed cases in preparation for opposition to Defendant's motion for reconsideration; reviewed SCOTUS Epic v. Lewis decision as well as other cases addressing class waivers in absence of arbitration clauses	Nicholas Conlon	
6/2/2018	6.3	Researched and outlining in preparation for response to Defendant's motion for reconsideration; reviewed court's order granting certification, Epic v. Lewis, cases addressing issue of whether collective waivers are enforceable outside FAA context; researched issue of whether 216(b) reflects a policy against collective action waivers; public policy under Pennsylvania law regarding class action waivers, unconscionability; researched cases addressing lack of consideration in employee handbooks	Nicholas Conlon	E
6/3/2018	4.6	Drafted portions of response to motion for reconsideration of conditional certification. motion; drafted section explaining why Epic v. Lewis is not controlling as to the issues in the court's order	Nicholas Conlon	E

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6/4/2018	3.1	Worked on response to Defendant's motion for reconsideration; drafted sections on why Defendant's collective waiver defense remains uncertain even in light of Epic v. Lewis; sections on lack of new evidence and no manifest injustice	Nicholas Conlon	E
6/6/2018	3.5	Review of the Defendants Motion for reconsideration, its reliance on Epiq, the Court ordering Certification and drafting the response to their motion	Jason Brown	E
6/6/2018	1.7	Prepare response to Defendant's motion for reconsideration - reviewed Jason Brown's edits; added statement of issue, statement of facts, and summary of argument; reviewed entire brief and polished language; finalized and filed on ECF	Nicholas Conlon	E
6/13/2018	0.2	Reviewed Defendant's reply in support of motion for reconsideration	Nicholas Conlon	
6/29/2018	0.2	Reviewed Plaintiff's paystubs to confirm he received bonus	Nicholas Conlon	
7/8/2018	0.1	Compiled intakes/notes from Avvo Ignite and saved to clio to prevent loss of data from cancelling Avvo Ignite subscription	Nicholas Conlon	C
7/11/2018	3.8	Drafted rogs and RPPs; reviewed Defendant's 216(b) opposition to assess particular documents to request and terminology to use	Nicholas Conlon	
7/12/2018	0.8	Finalized rogs and RFPs and emailed to Bernardo Valdez with instructions for serving on defense	Nicholas Conlon	
7/13/2018	0.3	BV - ADMIN - Serve Discovery Requests	Bernardo Valdez	C
7/16/2018	0.2	Review of order denying reconsideration and asking for notice to be distributed, contacting claims admins to obtain price quotes	Jason Brown	
7/16/2018	0.1	Email back from simpluris regarding notice	Jason Brown	
7/16/2018	0.3	Reviewed court's order approving notice and denying Defendant's motion for reconsideration	Nicholas Conlon	
7/16/2018	0.3	Prepared final notice, sent with class list and court's order to Simpluris for quote for handling 216(b) notice	Nicholas Conlon	
7/17/2018	0.3	Phone call with defense counsel regarding scheduling depositions; timeframe for completing pre-cert class discovery	Nicholas Conlon	
7/18/2018	0.5	Work on notice, arrangements for notice with notice administrator - emails and notifying defense counsel	Jason Brown	

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7/18/2018	0.2	Read and responded to emails with Simpluris regarding confirming final form of notice	Nicholas Conlon	
7/18/2018	0.2	Emailed BV instructions for handling Defendant's RFPs and rogs	Nicholas Conlon	I, C
7/18/2018	0.2	Read and responded to emails with Plaintiff	Nicholas Conlon	
7/19/2018	0.5	Review of discovery served by defendants	Jason Brown	
7/19/2018	0.1	Email from defense still awaiting document production to us	Jason Brown	
7/19/2018	1	Created Opt-In Spreadsheet and shared with Simpluris. Entered-by admin	Bernardo Valdez	C
7/19/2018	0.5	Emailed Defendant's Rogs/RFP to Client with Instructions. entered-by admin	Bernardo Valdez	C
7/19/2018	0.1	by - admin - confirm mailing address for sawyer before sending rogs package	Bernardo Valdez	C
7/20/2018	0.2	Postage: Sent Defendant's First Request of Rogs/RFP to Client via USPS Priority (no sig required)	Bernardo Valdez	C
7/24/2018	0.6	Drafted joint motion to extend pre-certification class discovery deadline and proposed order	Nicholas Conlon	
7/24/2018	0.2	Filed/submitted joint motion to extend pre-certification class discovery deadline and proposed order	Nicholas Conlon	
7/24/2018	0.1	Called Plaintiff. Left voicemail and sent email	Nicholas Conlon	
7/25/2018	0.2	Saved client's responses to defendants first set of rogs/rfp in clio.	Bernardo Valdez	C
7/25/2018	0.4	Reviewed calendar and attempted to coordinated depositions for Sawyer and Schenk; reviewed declarations previously sent to Schenk for 216(b) motion	Nicholas Conlon	
7/26/2018	0.8	Typed client's responses into word version of the Defendant's first set of rogs/rfp. entered-by admin	Bernardo Valdez	C
7/30/2018	0.1	Incoming call from potential Opt-in client Ashley Markle. I live transferred call to BL	Sueherminia Colon	C
7/30/2018	0.1	Spoke with potential opt-in	Benjamin Lin	
8/2/2018	0.3	Contacted Justin Schenk to schedule deposition; left him voicemail and sent him email; spoke with him regarding availability; sent him follow-up email confirming date	Nicholas Conlon	
8/6/2018	0.1	Review of opt-in report	Jason Brown	
8/6/2018	0.8	Filed Consent-to-Join Forms for Crystal Hamilton and Felicia Kissinger. Entered-by admin	Bernardo Valdez	C, E

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Date	Hours	Description	Person	Objection Code
8/7/2018	0.2	Phone call with defense counsel regarding timing of discovery; whether to call court regarding extension; potential extension of Defendant's response date - suggested that they serve their objections on time but have extension for responses	Nicholas Conlon	
8/7/2018	0.2	Phone call with defense counsel regarding timing of discovery; whether to call court regarding extension; potential extension of Defendant's response date - suggested that they serve their objections on time but have extension for responses	Nicholas Conlon	
8/8/2018	0.1	Joint request for enlarging discovery	Jason Brown	
8/8/2018	0.2	Phone call with defense counsel regarding status of discovery, scheduling of depositions	Nicholas Conlon	
8/8/2018	0.1	Emailed chambers regarding status of joint motion to extend discovery	Nicholas Conlon	
8/9/2018	0.7	by admin - Finalize client documents for production	Bernardo Valdez	C
8/11/2018	0.1	Review of simpluris opt-in count	Jason Brown	C
8/11/2018	0.1	Review of simpluris opt-in count	Nicholas Conlon	C
8/13/2018	0.3	Reviewed Plaintiff's internal responses to rogs and RFPs and made notes for finalizing responses and objections	Nicholas Conlon	
8/14/2018	0.2	Jason Brow, Nicholas Conlon, Tony Teng, Irene Chan discussed strategy moving forward - FILE REVIEW	Jason Brown	D, I
8/14/2018	0.2	Jason Brown, Nicholas Conlon, Tony Teng, Irene Chan discussed strategy moving forward - FILE REVIEW	Irene Chan	D, I
8/14/2018	0.2	Jason Brown, Nicholas Conlon, Tony Teng, Irene Chan discussed strategy moving forward - FILE REVIEW	Nicholas Conlon	D, I
8/14/2018	0.2	Jason Brown, Nicholas Conlon, Tony Teng, Irene Chan discussed strategy moving forward - FILE REVIEW	Tony Teng	D, I
8/14/2018	1.7	Drafted responses and objections to Defendant's rogs	Nicholas Conlon	
8/15/2018	0.3	Review of documents in preparation for deposition	Jason Brown	
8/15/2018	0.1	Email correspondence between Nicholas Conlon, Jason Brown and Ben Lin regarding declarations and deposition preparation	Nicholas Conlon	I
8/15/2018	0.1	Email correspondence between Nicholas Conlon, Jason Brown and Ben Lin regarding declarations and deposition preparation	Jason Brown	I

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Date	Hours	Description	Person	Objection Code
8/15/2018	0.1	Read emails from Nicholas Conlon and Jason Brown regarding declarations, deposition preparation	Benjamin Lin	I
8/15/2018	0.1	Order granting extension for discovery	Jason Brown	
8/15/2018	0.1	Read and responded to emails with defense counsel regarding extensions to discovery requests	Nicholas Conlon	
8/16/2018	0.2	Added Declarations to the Bates Stamped documents for Sawyer. Entered-by admin	Bernardo Valdez	C
8/17/2018	0.1	Receipt of notice of defendants to take deposition	Jason Brown	
8/20/2018	0.1	Review of weekly opt-in report	Jason Brown	
8/20/2018	1	Filed Consent Forms - Frederick Stallings, Anthony Kreitz, Angel Colon.	Bernardo Valdez	C
8/20/2018	0.1	Reviewed deposition notice received from defense and forwarded to Plaintiff	Nicholas Conlon	
8/20/2018	0.3	Reviewed and revised draft of protective order	Nicholas Conlon	
8/21/2018	0.1	Asking about witness to be subpoenaed from defense	Jason Brown	
8/21/2018	0.5	Initial review of defendants production and interrogatory answers or lack thereof	Jason Brown	
8/21/2018	0.1	Email to group Zijian Guan and Nicholas Conlon regarding defendants discovery answers or lack thereof	Jason Brown	D, I
8/21/2018	0.1	Email to group Zijian Guan and Jason Brown regarding defendants discovery answers or lack thereof	Nicholas Conlon	D, I
8/21/2018	0.1	Email to group Jason Brown and Nicholas Conlon regarding defendants discovery answers or lack thereof	Zijian Guan	D, I
8/21/2018	1.2	Drafted Plaintiff's RFP responses	Nicholas Conlon	
8/21/2018	0.3	Initial review Defendant's disc responses for deficiencies	Nicholas Conlon	
8/22/2018	0.4	Additional review of their discovery and starting to formulate deficiency letter	Jason Brown	
8/22/2018	0.2	Proposed response to lincare regarding their discovery abuses	Jason Brown	
8/22/2018	0.1	Email to defense counsel regarding discovery abuses	Jason Brown	
8/22/2018	0.1	Email back regarding Schenk	Jason Brown	
8/22/2018	0.1	Email from justin schenk	Jason Brown	
8/22/2018	0.3	Phone call with defense counsel regarding timing of document production; issues with protective order	Nicholas Conlon	

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8/22/2018	0.2	Reviewed protective order from prior EDPA case and emailed to defense counsel as suggested template	Nicholas Conlon	
8/22/2018	0.3	Read and responded to emails with Sawyer and Schenk regarding potential rescheduling of depositions	Nicholas Conlon	
8/22/2018	0.2	Read and responded to emails with defense counsel regarding confidentiality agreement, timing of document production	Nicholas Conlon	
8/22/2018	0.1	Reviewed and revised Jason Brown's draft email to defense counsel regarding deficient discovery responses	Nicholas Conlon	D
8/22/2018	1	Research case law regarding pre-certification discovery	Nicholas Conlon	
8/23/2018	1.2	Reviewed Defendant's responses and objections and Plaintiff's rogs and RFPs and noted deficiencies and improper objections	Nicholas Conlon	
8/23/2018	1.9	Prepared letter to Defendant regarding deficiencies in discovery responses and objections; further research into case law regarding geographical scope of pre-certification discovery and Defendant's objections to relevant time period	Nicholas Conlon	
8/24/2018	0.8	Further cataloguing of discovery, review of dispute of confidentiality order and letter to defendants regarding discovery deficiency	Jason Brown	
8/24/2018	0.1	Review of opt-ins from claims admin	Jason Brown	
8/24/2018	0.6	Completed draft of letter outlining deficiencies in Defendant's disc responses and objections	Nicholas Conlon	
8/24/2018	0.3	Finalized letter outlining deficiencies in Defendant's disc responses and objections; reviewed and incorporated Jason Brown's edits and sent to defense counsel	Nicholas Conlon	
8/26/2018	1.9	Drafted 30(b)(6) notice	Nicholas Conlon	
8/27/2018	0.8	Work on 30(b)(6) notice topics in context of proofs needed for rule 23 and the case in general	Jason Brown	
8/27/2018	0.1	Email correspondence regarding Schenk deposition	Jason Brown	
8/27/2018	0.1	Receipt of subpoena for Schenk	Jason Brown	
8/27/2018	0.2	Finalized 30(b)(6) notice and served on defense	Nicholas Conlon	
8/27/2018	0.3	Reviewed deposition notices to Sawyer and Schenk; added to calendar and emailed to Sawyer/Schenk	Nicholas Conlon	

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8/28/2018	0.1	Saved FOIA docs in clio.	Bernardo Valdez	C
8/28/2018	0.1	Read FOIA responses	Benjamin Lin	
8/28/2018	0.2	Jason Brown and Nicholas Conlon discuss deposition location and possible preparation of Shenk	Jason Brown	D, I
8/28/2018	0.2	Jason Brown and Nicholas Conlon discuss deposition location and possible preparation of Schenk	Nicholas Conlon	D, I
8/28/2018	0.2	Called and emailed Sawyer and Schenk to discuss deposition preparation	Nicholas Conlon	
8/28/2018	0.3	Phone call with Plaintiff	Nicholas Conlon	
8/29/2018	0.2	BV - ADMIN - BATES STAMP documents from FOIA DOL	Bernardo Valdez	C
8/29/2018	0.1	Saved Defendant's response to Plaintiff's first set of rogs/rfp in clio.	Bernardo Valdez	C
8/30/2018	0.2	Reviewed Defendant's second document production	Nicholas Conlon	
8/31/2018	0.2	Review of defendants subsequent request for confidentiality order and objections to discovery	Jason Brown	
9/4/2018	0.2	Spoke with Nicholas Conlon regarding upcoming depositions - logistics of coverage - who will defend/prepare, and travel	Jason Brown	D, I
9/4/2018	0.2	Spoke with Jason Brown regarding upcoming depositions - logistics of coverage - who will defend/prepare, and travel	Nicholas Conlon	D, I, T
9/4/2018	0.1	Incoming call from Justin Schenck Left message for Nicholas Conlon Forwarded message to Nicholas Conlon	Osmara Suazo	C
9/4/2018	0.1	Reviewed document production and emailed to defense counsel	Nicholas Conlon	
9/4/2018	0.1	Exchanged missed calls with Justin Schenck	Nicholas Conlon	
9/4/2018	0.2	Discussions with Jason Brown regarding arranging travel and coordinating preparation	Nicholas Conlon	D, I, T
9/4/2018	0.2	Discussions with Nicholas Conlon regarding arranging travel and coordinating preparation	Jason Brown	D, I, T
9/4/2018	0.2	Searched for and booked rental car for trip to Reading, PA for Schenck / Sawyer depositions	Nicholas Conlon	C, T
9/5/2018	1	Reviewed Defendant's document production and printed documents to potentially use in Schenck deposition	Nicholas Conlon	
9/5/2018	0.2	Emailed Plaintiff	Nicholas Conlon	

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9/5/2018	0.5	Picked up rental car for drive to Reading, PA for Schenck and Sawyer deposition	Nicholas Conlon	T
9/6/2018	3	Travel from Jersey City to Reading, PA for Deposition	Jason Brown	T
9/6/2018	1	Preparation for deposition	Jason Brown	
9/6/2018	2.8	Drive from Jersey City, NJ to Reading, PA for deposition of Justin Schenck	Nicholas Conlon	T
9/6/2018	4.3	Deposition of Justin Schenck - defended and asked questions on direct	Nicholas Conlon	
9/6/2018	0.8	Met with Sawyer to prepare for deposition	Nicholas Conlon	
9/6/2018	0.7	Returned rental car and got ride to hotel; checked in	Nicholas Conlon	T
9/7/2018	1	Travel from location one with Nicholas Conlon to deposition location	Jason Brown	D, T
9/7/2018	1	Travel from location one with Jason Brown to deposition location	Nicholas Conlon	D, T
9/7/2018	0.5	Pre-deposition discussions regarding preparation	Nicholas Conlon	D, I
9/7/2018	0.5	Pre-deposition discussions regarding questions from yesterday and witness for today, lead plaintiff	Jason Brown	D, I
9/7/2018	6	Assisted Jason T. Brown with defense of Sawyer's deposition	Nicholas Conlon	D
9/7/2018	6	Defense of Sawyer's deposition	Jason Brown	
9/7/2018	2.4	Travel from Sawyer's deposition back to Jersey City	Jason Brown	D, T
9/7/2018	2.4	Travel from Sawyer's deposition back to Jersey City	Nicholas Conlon	D, T
9/9/2018	0.1	Review claims admin opt-in counts	Jason Brown	
9/10/2018	0.3	Nicholas Conlon and Jason Brown spoke with defense counsel regarding depositions	Jason Brown	
9/10/2018	0.3	Nicholas Conlon and Jason Brown spoke with defense counsel regarding depositions and possible settlement -she will see if their in-house paralegal can digest driver's logs; we will make settlement for opt-ins based on eyeballing numbers; agreed to put depositions on calendar for October in Reading, Pennsylvania; we will take 30(b)(6), deposition of Poff and potentially another CM; they want to depose a few opt-ins	Nicholas Conlon	D
9/10/2018	0.3	Worked on obtaining dates of employment from opt-ins for purposes of settlement demand; reviewed opt-in spreadsheet; drafted email to opt-in plaintiffs regarding dates of employment, documents, deposition availability	Nicholas Conlon	
9/11/2018	0.1	Called Angel Colon There was no response, left voicemail	Osmara Suazo	C
9/11/2018	0.1	Called Felicia Kissinger There was no response, left voicemail	Osmara Suazo	C

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9/11/2018	0.1	Called Anthony Kreitz There was no response, left voicemail	Osmara Suazo	C
9/11/2018	0.1	Received call back from Angel Colon interviewed re: basic details of employment and OT claims	Osmara Suazo	C
9/11/2018	0.1	Received call back from Felicia Kissinger interviewed re: basic details of employment and OT claims	Osmara Suazo	C
9/11/2018	0.1	Received call back from Anthony Kreitz interviewed re: basic details of employment and OT claims	Osmara Suazo	C
9/11/2018	0.1	Called Frederick Stallings Per Nicholas Conlon's request, ask if he has received the email sent out regarding the lawsuit and ask for his dates of employment There was no response, left voicemail	Osmara Suazo	C
9/11/2018	0.4	Created rough damage model for collective based on Sawyer's rate of pay and dates of employment for each opt-in	Nicholas Conlon	
9/11/2018	0.1	Emailed Osmara Suazo instructions for reaching out to opt-ins to confirm dates of employment	Nicholas Conlon	I
9/11/2018	0.2	Revised defendant's draft confidentiality agreement; restyled as consent order and sent to defense counsel for review	Nicholas Conlon	
9/11/2018	0.2	Read and responded to emails with Plaintiff regarding settlement; managers to depose	Nicholas Conlon	
9/12/2018	0.1	Jason Brown & Nicholas Conlon called Marilyn G. Moran	Jason Brown	
9/12/2018	0.1	Jason Brown & Nicholas Conlon called Marilyn G. Moran	Nicholas Conlon	D
9/12/2018	0.9	Drafted email to defense requesting meet/confer regarding deficiencies in their disc responses	Nicholas Conlon	
9/13/2018	0.2	Email to defendants regarding discovery issues and coordination of depositions	Jason Brown	
9/16/2018	0.1	Review of weekly opt-in report	Jason Brown	
9/20/2018	0.1	Read and responded to emails with defense counsel arranging call to discuss outstanding discovery issues	Nicholas Conlon	
9/21/2018	0.7	Phone call w/ defense counsel re: gave settlement demand and discussed outstanding discovery issues	Nicholas Conlon	
9/21/2018	0.1	Follow up email regarding single rog being served	Jason Brown	

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Date	Hours	Description	Person	Objection Code
9/21/2018	0.3	Drafted rog regarding unit dose bonus and served on Defendant; emailed to confirm availability for depositions	Nicholas Conlon	
9/25/2018	0.1	Email correspondence regarding depostion schedule	Jason Brown	
9/25/2018	0.1	Phone call with Jason Brown regarding email from defense counsel regarding deposition dates	Nicholas Conlon	D, I
9/25/2018	0.1	Phone call with Nicholas Conlon regading email from defense counsel regarding deposition dates	Jason Brown	D, I
9/25/2018	0.2	Read and responded to email from defense counsel regarding deposition dates	Nicholas Conlon	
9/25/2018	0.2	Send follow-up email to defense counsel regarding expected timing of their response to settlement demand made on 9/21	Nicholas Conlon	
9/26/2018	0.2	Send follow-up email to plaintiffs regarding deposition dates	Nicholas Conlon	
9/28/2018	0.1	Incoming call from Angel Colon Live transferred call to Nicholas Conlon	Osmara Suazo	C
9/28/2018	0.2	Phone call with Angel Colon	Nicholas Conlon	
9/28/2018	0.1	Confirm Defendant's production is added to clio	Nicholas Conlon	
9/29/2018	0.3	Reviewed and labelled Defendant's document production	Nicholas Conlon	
9/30/2018	0.5	Review Defendant's recent document production	Nicholas Conlon	
10/2/2018	0.2	Read and responded to emails with defense counsel regarding scheduling deposition's, questions about their damage estimate for settlement purposes	Nicholas Conlon	
10/2/2018	0.1	Finalized proposed confidentiality order and submitted to chambers via email	Nicholas Conlon	
10/3/2018	0.8	Drafted email to defense counsel raising issues with scheduling Plaintiff's deposition's and failure to cooperate with scheduling Defendant's deposition's, and also addressing deficiencies in document production	Nicholas Conlon	
10/3/2018	0.8	Drafted deposition notices for Mike Wissler, Brian Jones, and 30(b)(6); searched for court reporting services in the Clearwater Florida area	Nicholas Conlon	
10/3/2018	0.1	Phone call with Jason Brown regarding noticing deposition's, dates and locations	Nicholas Conlon	D, I
10/3/2018	0.1	Phone call with Nicholas Conlon regarding noticing deposition's, dates and locations	Jason Brown	D, I
10/3/2018	0.1	Phone call with Jason Brown regarding Defendant's question of whether we will agree to have fees submitted to court for resolution	Nicholas Conlon	D, I

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10/3/2018	0.1	Phone call with Nicholas Conlon regarding Defendant's question of whether we will agree to have fees submitted to court for resolution	Jason Brown	D, I
10/3/2018	0.1	Phone call with defense counsel regarding her proposal to have court decide fees/costs in context of settlement for opt-ins' recovery.	Nicholas Conlon	
10/3/2018	0.1	Follow-up call with defense counsel; made settlement demand	Nicholas Conlon	
10/3/2018	0.2	Reviewed damage model and updated expense entries for purposes for determining amount to demand for opt-ins and fees/expenses	Nicholas Conlon	
10/4/2018	0.1	Reviewed email from defense counsel with settlement offer	Nicholas Conlon	
10/4/2018	0.1	Phone call with defense counsel regarding response to their offer	Nicholas Conlon	
10/4/2018	0.5	Worked on damage model, built in formula to assess individual shares based on various settlement scenarios and created formula to factor in varying incentive award amounts	Nicholas Conlon	
10/5/2018	0.1	Email from defense counsel regarding status of things	Jason Brown	
10/5/2018	0.1	Phone call with defense counsel regarding settlement negotiations; discussed cap for attorneys' fees	Nicholas Conlon	
10/12/2018	1	Pulled pacer and lexis expenses. Entered-by admin	Bernardo Valdez	C, E
10/22/2018	0.1	Incoming call from Attorney Marilyn Moran, I took message and forward to NC	Sueherminia Colon	C
10/22/2018	0.1	Phone call w/ defense counsel re: status of settlement docs	Nicholas Conlon	
10/23/2018	0.2	Drafted and submitted letter to court notifying of settlement in principle	Nicholas Conlon	
10/24/2018	0.3	Calculated final settlement splits	Nicholas Conlon	
10/24/2018	0.1	Emailed Sawyer re; status of settlement	Nicholas Conlon	
10/24/2018	0.2	Compiled time and expense records into spreadsheet and sent to admins to finalize	Nicholas Conlon	
10/25/2018	0.5	Working on Jefree Sawyer v. Lincare Fees and Expenses Spreadsheet	Osmara Suazo	C
10/27/2018	0.4	review of settlement agreements	Jason Brown	
10/30/2018	0.6	Reviewed and revised draft settlement agreement; research into Judge Leedson approval cases	Nicholas Conlon	
11/10/2018	0.3	Reviewed and revised draft settlement agreement	Nicholas Conlon	
11/13/2018	0.5	Further review and revision to settlement agreement and reviewed breakdown of settlement amount amongst the plaintiffs	Nicholas Conlon	

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Date	Hours	Description	Person	Objection Code
11/20/2018	0.1	Answered incoming call from Anthony Kreitz, to give him instructions on how to process settlement docs and w9.	Bernardo Valdez	C
11/20/2018	1.6	Emailed settlement agreement and related docs and w9 forms to all clients. entered-by admin	Bernardo Valdez	C
11/20/2018	0.1	Updated Crystal hamilton's contact info in lex and clio. entered-by admin	Bernardo Valdez	C
11/20/2018	0.1	Incoming call from Frederick Stallings, BV clarified what the settlement agreement and tax docs were for, Stallings said he will sign forms soon. Entered-by admin	Bernardo Valdez	C
11/20/2018	0.6	Drafted settlement paperwork for each plaintiff as well as explanatory cover-email; sent to admins to send to each plaintiff	Nicholas Conlon	
11/26/2018	0.1	Wrote instructions to BV for handling unresponsive plaintiff Frederick Stallings	Nicholas Conlon	I
11/27/2018	0.1	Called and spoke to Frederick Stallings, confirmed he will look at docs today via email and process them. Entered-by admin	Bernardo Valdez	C
11/28/2018	0.2	Sent client signed settlement agreements & w95 to defense counsel. Entered-by admin	Bernardo Valdez	C
11/30/2018	0.2	Drafted status report re: settlement process - emailed to chambers	Nicholas Conlon	
11/30/2018	0.1	r/r emails w/ defense counsel re: status report re: settlement process	Nicholas Conlon	
12/5/2018	0.1	r/r emails w/ defense counsel re: status of motion to seal	Nicholas Conlon	
12/7/2018	0.1	Reviewed and revised D's draft of joint motion to seal	Nicholas Conlon	
12/11/2018	0.1	Incoming call from Frederick Stallings Calling to ask about settlement checks Spoke to NC and provided Mr. Stallings with the information NC provided	Osmara Suazo	C, I
12/13/2018	0.1	Reviewed order denying motion to seal and r/r emails w/ defense counsel re: whether they intend to re-file	Nicholas Conlon	
12/15/2018	1.5	Reviewed motions for FLSA settlement approval and awards of attorneys' fees in FLSA cases in 3rd circuit; pulled filings to use as templates for upcoming motions	Nicholas Conlon	
12/16/2018	1.2	Reviewed time entries and made stylistic edits to clarify descriptions; classified each entry by activity type in order to provide breakdown in fee petition	Nicholas Conlon	

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12/17/2018	0.2	Researched case law re: relevance of opposing counsel's fees for purposes of fee petition	Nicholas Conlon	
12/17/2018	1	Worked on draft of motion for settlement approval	Nicholas Conlon	
12/18/2018	2.8	Worked on portions of brief in support of motion for settlement approval	Nicholas Conlon	
12/19/2018	2.2	Further work brief in support of motion for settlement approval; drafted notice of motion and proposed order; emailed to defense counsel for review	Nicholas Conlon	
12/19/2018	0.5	Finalized and filed motion for settlement approval; created PDF exhibits w/ each P's signature on settlement docs; filed and emailed proposed order to clerk's office	Nicholas Conlon	
12/27/2018	0.1	Email defense counsel re: potential interest in resolving motion for fees/expenses and whether they will share their time records in the event they oppose	Nicholas Conlon	
1/22/2019	0.1	em from defendant offering 30k in fees	Jason Brown	
1/22/2019	0.1	em back to NC re: whether its fees and expenses	Jason Brown	
1/28/2019	0.1	Incoming call from Frederick Stallings Took a message and forwarded message to NC	Osmara Suazo	C
2/14/2019	0.2	Phone call w/ Marilyn. Demanded \$95k for fees/expenses. Her rate on this case is \$270 because they are being paid by insurance. She usually bills \$500 per hour. Reasonable rates are \$250 - \$350. Travel expenses are not recoverable because we were out-of-state counsel. Their fees are higher than our fees; they've had to do more. Not as much as 3:1, which she says is a proper ratio under the case law. She believes court would award between \$50k and \$70k. Client said \$35k was max. Marilyn says if we get it closer to to \$70k we might be able to get it done. I asked if they will have a prompt response - she said probably not because client is stuck at \$95k, but she will check.	Nicholas Conlon	
2/7/2019	0.1	Team meeting, discussed case with JIB, NC, TT and LC	Jason Brown	D, I
2/7/2019	0.2	Team meeting, discussed case with JIB, NC, TT and LC	Lotus Cannon	D, I
2/7/2019	0.2	Team meeting, discussed case with JTB, NC, TT and LC	Nicholas Conlon	D, I
2/7/2019	0.2	Team meeting, discussed case with JIB, NC, TT and LC	Tony Teng	D, I
2/20/2019	0.1	Called Frederick Stallings There was no response. Left vm	Osmara Suazo	C

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2/20/2019	0.1	Spoke to Frederick Stallings Informed client we are still awaiting court approval as NC stated	Osmara Suazo	C
4/10/2019	0.8	Researched case law in 3rd circuit re: contested motions for attorneys' fees in FLSA cases	Nicholas Conlon	
4/22/2019	0.8	review of entire file billing and expenses for fee petition	Jason Brown	
4/10/2019	0.3	sw JIB re: Researched case law in 3rd circuit re: contested motions for attorneys' fees in FLSA cases and status of settlement negotiations on fees to save the Court from troubling it with a a fee peititon	Nicholas Conlon	D
4/10/2019	0.3	sw NC re: Researched case law in 3rd circuit re: contested motions for attorneys' fees in FLSA cases and status of settlement negotiations on fees to save the Court from troubling it with a a fee peititon	Jason Brown	D
4/22/2019	0.3	sw NC re: last ditch effort to compromise fees so as to not trouble the court or alternatively plan to submit this week	Jason Brown	D
4/22/2019	0.3	sw NC re: last ditch effort to compromise fees so as to not trouble the court or alternatively plan to submit this week	Nicholas Conlon	D
4/11/2019	0.7	Further legal research in prep for motion for attorneys' fees - continued reviewing cases in which settlement reached and fees submitted to court	Nicholas Conlon	
4/20/2019	2.9	Further legal research in prep for motion for attorneys' fees - continued compiling/reviewing cases in which fees decided by court after settlement; reviewed 3rd circuit case law re: whether common fund analysis applies	Nicholas Conlon	
4/20/2019	1	Further legal research in prep for motion for attorneys' fees - researched 3rd circuit case law approval of various types of litigation expenses	Nicholas Conlon	
4/22/2019	2.8	Worked on outline for brief in support of motion for attorneys' fees - reviewed cases compiled in research and added relevant passages to outline; reviewed motions filed in similar cases	Nicholas Conlon	
4/23/2019	2.4	work on finalizing brief for approval of fees, argument, caselaw and final proofs	Jason Brown	
4/23/2019	1.5	Gather all LX Advance, Courtlink, and Pacer expenses for update, update postage, compile into spreadsheet for NC to review.	Rebecca Mahabir	C
4/23/2019	0.5	work on Firm Resume	Jason Brown	C

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4/22/2019	0.8	Reviewed time and expense records for clarity; reviewed current draft of firm resume and sent to RM for further edits; reviewed fee petitions in recent cases to assess ways to improve presentation of records in exhibits	Nicholas Conlon	
4/22/2019	0.7	Reviewed cases in which court ruled on contested fee petition filed after settlement and made notes re: settlements amounts and amounts awarded as fees to include in string cite	Nicholas Conlon	
4/22/2019	7.4	Drafted full brief in support of motion for attorneys' fees	Nicholas Conlon	
4/23/2019	4.3	Finalized motion for attorneys' fees - reviewed expense records and further clarified descriptions; reviewed JTB's edits to brief; added discussion of efforts to resolve fee petition and need for defense to submit their own time records; reviewed brief and added citations to declaration and table of contents; checked Judge Leeson's individual practices and added required content. Drafted declaration of Jason Brown, notice of motion and proposed order	Nicholas Conlon	

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C = Clerical Tasks/Overhead

D = Duplication of Effort

E = Excessive Time

I = Inter-Office Conference

T = Travel to/from District